

Remarks/Arguments

Claims 1-2 and 4-8 are pending.

Claim 3 has been indicated to be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. In this regard, claim 3 has been cancelled and claim 1 has been rewritten to include the limitations of claim 3. Applicants submit that amended claim 1, and claim 2 which depends therefrom, are now allowable.

Rejection of claims 4-8 under 35 USC 103(a) as being unpatentable over Ludke (US Pat No 6237049)

Applicants traverse this rejection and submit that for the reasons discussed below present claims 4-8 are patentably distinguishable over the teachings of Ludke.

The examiner acknowledges that Ludke fails to teach or suggest UPnP protocol specific operations, but takes Official Notice that the purpose of the HAVi network architecture is to promote interoperability, and thus, it would have been obvious to one skilled in the art at the time the invention was made to have included a UPnP protocol specific specification into a HAVi network environment to promote the interoperability of plug and play devices. However, applicants submit that even if the Official Notice is properly applied, the above-generalized conclusion fails to teach or suggest the specific invention of claim 4.

Present claim 4 recites, "... representing, in a sub-network bridging device, each of said discovered elements by a UPnP proxy service **identified by a port number attributed by said sub-network bridging device...** (emphasis added)" Applicants submit that nowhere does the combination of Ludke and the Official Notice teach or suggest this feature.

As discussed in the specification, for example, on page 18, lines 2-11, there are at least two solutions for representing a HAVi device or a HAVi functional component within the bridge. That is: 1) based on port numbers, this solution is further described in the specification; and 2) based on use of multiple IP addresses. In the second solution local IP addresses are assigned to each device


or functional component within the HAVi network. This assignment can be made to be consistent within the HAVi network. This assignment can be made to be consistent with the SSDP mechanism. The invoked HAVi component (either a DCM or an FCM) can, on instantiation, request a unique IP address assignment from the bridge just as any other UPnP device entering the UPnP network. Applicants submit that this second solution corresponds to the manner in which one skilled in the art would have implemented a bridge at the time the invention was made.

However, the first solution, to which claim 4 is directed, is quite different from the second solution and is not taught or suggested by the combination of Ludke and the Official Notice. Specifically, neither Ludke nor the Official Notice teach or suggest a UPnP proxy service identified by a port number attributed by a sub-network bridging device in order to have one IP address corresponding to the bridge address. Rather, several multiple IP addresses to represent HAVi elements would have been used in a bridge as mentioned with respect to the second solution. When multiple IP addresses are used, a service does not need to be identified by a port number attributed by a sub-network bridging device. In view of the above, applicant submit that neither Ludke nor the Official Notice teach or suggest the above-cited limitation of present claim 4, and as such, present claim 4, and the claims that depend therefrom, are patentably distinguishable over the teachings of Ludke and the Official Notice.

Having fully addressed the Examiner's rejections it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the applicant's attorney at (609) 734-6815, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Respectfully submitted,

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